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Attorneys for Plaintiff and Counter Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHEMEON SURFACE TECHNOLOGY, LLC, a
Nevada limited liability company,

Plaintiff,

v.

METALAST INTERNATIONAL, INC., a Nevada
corporation; METALAST, INC., a Nevada
corporation; SIERRA DORADO, INC., a Nevada
corporation; DAVID M. SEMAS, an individual;
GREG D. SEMAS, an individual; and WENDI
SEMAS-FAURIA, an individual.

Defendants.

DAVID M. SEMAS; and METALAST
INTERNATIONAL, INC.,

Counterclaimants,

v.

CHEMEON SURFACE TECHNOLOGY, LLC,
DEAN S. MEILING; and MADYLON
MEILING,

Case No.: 3:15-cv-00294-MMD-VPC

**STIPULATION and [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE PROPOSED JOINT PRETRIAL
ORDER
[FIRST REQUEST]**

1 Counter Defendants.
2 CHEMEON SURFACE TECHNOLOGY, LLC, a
3 Nevada limited liability company,
4 Plaintiff,
5 v.
6 MHA GROUP, a company; and MARC HARRIS,
an individual.
7 Defendants.

Consolidated with:
Case No. 3:15-cv-00295-MMD-VPC

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9 Plaintiff/Counter Defendants CHEMEON Surface Technology and Counter Defendants
10 Dean S. Meiling and Madylon Meiling (collectively “CHEMEON”), by and through their
11 undersigned counsel, Robert C. Ryan of Holland & Hart, LLP; Defendants Metalast International,
12 Inc., Metalast, Inc., Sierra Dorado, Inc., David M. Semas, and Counterclaimants Metalast
13 International, Inc. and David M. Semas (collectively “Metalast Defendants”), by and through their
14 undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate and agree
15 as follows:

16 1. On April 2, 2018, the Court entered its Minute Order In Chambers (ECF No. 400)
17 directing the Proposed Joint Pretrial Order to be filed within 60 days.

18 2. Pursuant to the Minute Order, the Proposed Joint Pretrial Order is due June 1,
19 2018.

20 3. Currently still pending before the Court are the following briefs and motions:
21 a. supplemental briefing by the parties on the cancellation claim/fraudulent
22 renewal at ECF Nos. 354, 356, and 404 and 405; and
23 b. motion for reconsideration briefing by the parties at ECF Nos. 412, 413,
24 and 417.

25 4. The parties agree to extend the deadline within which to file the Proposed Joint
26 Pretrial Order to 30 days after the Court enters its rulings on the pending matters identified in
27 paragraph 3 above.

28 5. This extension is agreed to and requested based on the Court’s response to the

parties' joint inquiry to the Court concerning the deadline to file the Proposed Joint Pretrial Order.

6. This is the first request for an extension of time to file the Proposed Joint Pretrial Order.

7. This request for an extension is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 17th day of May, 2018.

HOLLAND & HART LLP

/s/ Tamara Reid
Robert C. Ryan (7164)
Timothy A. Lukas (#4678)
Tamara Reid (9840)
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Attorneys for Chemeon Surface Technology, LLC, Dean S. Meiling, and Madylon Meiling

DATED this 17th day of May, 2018.

HOY CHRISSINGER KIMMEL PC

/s/ Michael D. Hoy
Michael D. Hoy (2723)
Bank of America Tower
50 West Liberty Street, Suite 840
Reno, Nevada 89501
Telephone: (775) 786-8000
Facsimile: (775) 786-7426
Attorneys for Metalast International, Inc., Metalast, Inc., Sierra Dorado, Inc., David M. Semas, Greg D. Semas, and Wendi Semas-Fauria

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: May 17, 2018

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PROOF OF SERVICE

Pursuant to FRCP 5, I, declare, as follows:

I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

I am readily familiar with Holland & Hart's practice for collection and processing of: HAND DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary course of business provides for the delivery or faxing and/or mailing with the United States Postal Service, to occur on the same day the document is collected and processed.

On May 17, 2018, I served the foregoing, **STIPULATION and [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE PROPOSED JOINT PRETRIAL ORDER [FIRST REQUEST]**, as follows:

☒ **ELECTRONIC:** by electronic transmission through the United States District Court's CM/ECF system to the parties below:

Michael D. Hoy
HOY CHRISSINGER KIMMEL
Bank of America Tower
50 West Liberty Street, Suite 840
Reno, Nevada 89501
Telephone: (775) 786-8000
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mhoy@nevadalaw.com

Attorneys for Defendants

☒ **U.S. MAIL:** by placing a true copy thereof in Holland & Hart's outgoing mail in a sealed envelope addressed as follows:

Marc Harris
2471 Morning Dew Drive
Brea, CA 92821
Telephone: 714-642-1021
Email: Marcharr3@hotmail.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on May 17, 2018.

/s/ Jeanette Sparks